ATTORNEY DOCKET NO.: 2003P01972WOUS

AMENDMENTS TO THE DRAWINGS

The attached sheet of drawings includes changes to Fig. 1. This sheet,

which includes Fig. 1, replaces the original sheet including Fig. 1. Fig. 1 has

been amended to obviate the objection under 37 CFR 1.83(a). No new matter

has been added.

Attachment: Replacement Sheet(s)

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REMARKS

Claims 14-24 were previously pending in the application. By the Amendment, Fig. 1 is currently amended. Claims 14-24 remain unchanged. Reconsideration in view of the above amendments and the following remarks is respectfully requested.

The drawings were objected to under 37 C.F.R. §1.83(a). Additionally, the claims stand rejected under 35 U.S.C. §112, second paragraph. Still further, the claims stand rejected over the prior art of record. In particular, claims 14, 15, 23 and 24 were rejected under 35 U.S.C. §102(b) as being anticipated by Mizumura (U.S. Published Patent Application No. 2004/0005815)*. Additionally, claims 14 and 24 were rejected under 35 U.S.C. §102(b) as being anticipated by Machado (U.S. Patent No. 6,764,321), and claims 14-24 were rejected under 35 U.S.C. §103(a) as being unpatentable over "Applicant's Admitted Prior Art (AAPA)" in view of Machado.

Independent Claims

Independent claim 14 recites a connector device for the production of an electrical connection between a mains cable and a cable harness in an electrical device, especially a household appliance. The device includes a first plug-in connector including connection elements coupleable to the cable harness. The connection elements effect a detachable mechanical and electrical connection between the first plug-in connector and the cable harness. The device also includes a second plug-in connector establishing a detachable mechanical and electrical connection to the mains cable, where the second plug-in connector is provided for a plurality of different mains cables and has an identical connector configuration for each of the different mains cables.

^{*} The Office Action still refers to the Mizumura publication as "Judge et al.," which appears to be an error.

Independent claim 24 recites a connection system comprising a plurality of different mains cables each having a differently configured mains contact plug and a connector device for the production of an electrical connection between any of the plurality of mains cables and a cable harness in an electrical device. The connector device includes a first plug-in connector including connection elements coupleable to the cable harness, where the connection elements effect a detachable mechanical and electrical connection to the cable harness of the electrical device, and a second plug-in connector establishing a detachable mechanical and electrical connection to any of the mains cables. The second plug-in connector is provided for the plurality of different mains cables and has an identical connector configuration for each of the different mains cables. The plurality of mains cables have a corresponding connector contact plug with an identical configuration regardless of the design of the mains contact plug and comprise a cable harness whose plurality of electrical conductors can be connected to the connector device by means of a single plug-in contact connection.

Drawings

With regard to the drawing objection, Fig. 1 has been amended to show a plurality of different mains cables, each having a differently configured mains contact plug. Support for this subject matter can be found in the specification at, for example, paragraphs [022]-[023]. Withdrawal of the objection is requested.

Indefiniteness under 35 U.S.C. §112, second paragraph

The Office Action contends that the scope of claims 14 and "portions of claim 24" are indefinite "because there is an inconsistency between the body and the preamble." According to the Office Action, "the body contains positive limitations directed toward a mains cable and a cable harness, suggesting that applicant intends to claim the combination of the connector device, the mains cable and the cable harness." With regard to claim 14, claim 14 defines a connector device for the production of an electrical connection between the

mains cable and the cable harness in an electrical device. Claim 14 defines the parts of the connector device and their ability to connect with the mains cable and cable harness. The mains cable and cable harness in fact are not positively claimed in claim 14. More specifically, claim 14 defines the connector device including (1) a first plug-in connector including connection elements . . . , and (2) a second plug-in connector. The structure of the first plug-in connector enables the connector to be coupled with the cable harness, where the connection elements effect a detachable mechanical and electrical connection between the first plug-in connector and the cable harness. The second plug-in connector includes structure that enables it to establish a detachable mechanical and electrical connection to the mains cable. In no instance in claim 14 are the mains cable and cable harness positively claimed as part of the connector device. Applicants submit that those of ordinary skill in the art would readily understand that claim 14 defines features of the connector device and their structural configuration to effect an electrical connection between a mains cable and a cable harness. Applicants thus submit that claim 14 satisfies the requirements of 35 U.S.C. §112, second paragraph.

Claim 24, on the other hand, defines a connection <u>system</u>. The connection system includes (1) a plurality of different mains cables, and (2) a connector device for the production of an electrical connection between the mains cables and a cable harness. The connector device also includes structure similar to that noted with regard to claim 14. As such, the <u>connection system</u> defined in claim 24 positively includes the plurality of different mains cables and the connector device. As would be appreciated by those of ordinary skill in the art, the cable harness is not positively defined in claim 24, but rather, claim 24 defines the structural configuration for effecting a connection between the mains cable and a cable harness. Applicants thus submit that claim 24 also satisfies the requirements of 35 U.S.C. §112, second paragraph.

Withdrawal of the rejection is requested.

Rejections Over Prior Art

Claims 14, 15, 23 and 24 are not unpatentable under 35 U.S.C. §102(b) as being anticipated by Mizumura.

As discussed previously, the Mizumura publication relates to a backplane connector disposed between circuit boards that intersect each other at a right angle. In contrast with the claimed invention, no part of the connector is "coupleable to [a] cable harness," nor is any part of the connector structured to effect "a detachable mechanical and electrical connection to [a] mains cable" as claimed. The Remarks from the Amendment filed March 29, 2010 are hereby incorporated by reference. In the "Response to Arguments" section, the Office Action contends that the claims "are not structurally distinguishable from the prior art." The Office Action further contends that "the terms detachable/coupleable just mean that the structure be able to be coupled/detached." Without conceding this mischaracterization of the prior art and the claims, Applicants have argued that despite the specifically identified structural distinctions, the structure described in the Mizumura publication in fact is NOT coupleable to a cable harness nor capable of effecting a detachable mechanical and electrical connection to a mains cable as claimed. Indeed, the Office Action has provided no comment or discussion concerning how the Mizumura backplane connector, which is disposed between circuit boards that intersect each other at a right angle, could possibly serve to connect a cable harness to a mains cable.

Moreover, as also discussed previously, claim 24 recites that the connection system includes a <u>plurality of different mains cables each having a differently configured mains contact plug</u> . . . Additionally, claim 24 recites that the second plug-in connector establishes a detachable mechanical and electrical connection to <u>any of the mains cables</u>, <u>where the second plug-in connector is provided for the plurality of different mains cables and has an identical connector configuration for each of the different mains cables</u>. Moreover, each of the plurality of mains cables has a corresponding connector contact plug with an

identical configuration regardless of the design of the mains contact plug Clearly, reference to the "plurality of different mains cables" amounts to a *structural* component. Since Mizumura lacks the plurality of different mains cables, for this reason also, Applicants submit that the rejection is misplaced. This argument has also been disregarded in the Office Action.

With regard to dependent claims 15 and 23, Applicants submit that these claims are allowable at least by virtue of their dependency on an allowable independent claim and because they recite additional patentable subject matter.

Reconsideration and withdrawal of the rejection are respectfully requested.

Claims 14 and 24 are not unpatentable under 35 U.S.C. §102(b) as being anticipated by Machado.

In the March 29 Amendment, Applicants explained that Machado discloses a ground potential adaptor that enables live and neutral contacts of a supply outlet to be isolated from live and neutral contacts of an electrical device. According to Machado, the adaptor serves to earth the equipment through the earth connection of the mains cable and to isolate the mains voltage by severing connections to the live and neutral pins of the equipment plug. The connector device of the claimed invention, in contrast, facilitates a connection between a mains cable and an electrical device. This distinction is disregarded in the Office Action. Applicants submit that Machado lacks at least the claimed first plug-in connector including connection elements coupleable to the cable harness that effect a detachable mechanical and electrical connection between the first plug-in connector and the cable harness. Additionally, Machado lacks the claimed second plug-in connector establishing a detachable mechanical and electrical connection to the mains cable, where the second plug-in connector is provided for a plurality of different mains cables and has an identical connector configuration for each of the different mains cables.

Claim 24 similarly defines distinguishable structure, including, among other things, the plurality of mains cables and the connector device. This structure is also lacking in the Machado patent.

Reconsideration and withdrawal of the rejection are respectfully requested.

Claims 14-24 are not unpatentable under 35 U.S.C. §103(a) over "Applicant's Admitted Prior Art (AAPA)" in view of Machado.

With regard to the AAPA in view of Machado, the shortcomings of this rejection was also discussed in the March 29 Amendment. The Office Action does not address these arguments. In particular, Applicants argued that the AAPA similarly lacks the structure of the connector device defined in claim 14 and of the connection system defined in claim 24. Rather, the AAPA describes the known connector device including a firm connection to a mains cable with electrical conductors crimped or welded to corresponding contacts of the connector device inside the mains connecting socket. The contact blades are used for electrical connection to a cable harness of the electrical appliance. The electrical connection between the mains connecting socket and the cable harness is made by means of single tab connectors. The hard connection to the mains cable requires that electrical appliances must be provided with a plurality of variants for different countries based on different contact plugs specific to different countries. In contrast, the connector device defined in claim 14 includes, among other things, a second plug-in connector that establishes a detachable mechanical and electrical connection to the mains cable, where the second plug-in connector is provided for a plurality of different mains cables and has an identical connector configuration for each of the different mains cables. At least this structure is lacking in AAPA and Machado. Claim 24 defines a connection system including the connector device and a plurality of different mains cables each having a differently configured mains contact plug. This structure is also lacking in AAPA and Machado.

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With regard to the dependent claims, Applicants submit that these claims are allowable at least by virtue of their dependency on an allowable independent claim and because they recite additional patentable subject matter. In this context, Applicants argued previously that although the Office Action references "an interference suppression filter," the Office Action fails to address the other structural details of the dependent claims. This Office Action again fails to address these features of the invention. Applicants respectfully request a complete, full and fair examination of the claims, including the dependent claims. See MPEP §§ 707.07(g) and 707.07(f).

Reconsideration and withdrawal of the rejection are requested.

Conclusion

In view of the above, entry of the present Amendment and allowance of Claims 14-24 are respectfully requested. If the Examiner has any questions regarding this amendment, the Examiner is requested to contact the undersigned. If an extension of time for this paper is required, petition for extension is herewith made.

Respectfully submitted,

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